

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC, IVC FILTERS  
MARKETING, SALES PRACTICES AND  
PRODUCTS LIABILITY LITIGATION

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Case No. 1:14-ml-2570-RLY-TAB  
MDL No. 2570

This Document Relates to Plaintiffs

DONALD SNOW

Civil Case #1:20-cv-108

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**SHORT FORM COMPLAINT**

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COMES NOW the Plaintiff(s) named below, and for Complaint against the Defendants named below, incorporate The Master Complaint in MDL No. 2570 by reference (Document 213).

Plaintiff(s) further show the court as follows:

1. Plaintiff:

Donald Snow

2. Spousal Plaintiff/Deceased Party's spouse or other party making loss of consortium claim:

Not Applicable

3. Other Plaintiff and capacity (i.e., administrator, executor, guardian, conservator):

None

4. Plaintiff's/Deceased Party's state of residence at the time of implant:

Illinois

5. Plaintiff's/Deceased Party's state of residence at the time of injury:

Illinois

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6. Plaintiff's/Deceased Party's current state of residence:

Illinois

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7. District Court and Division in which venue would be proper absent direct filing:

U.S. District Court for the Central District of Illinois

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8. Defendants (Check Defendants against whom Complaint is made):

☒ Cook Incorporated

☒ Cook Medical LLC

☒ William Cook Europe ApS

9. Basis of Jurisdiction:

☒ Diversity of Citizenship

☐ Other: \_\_\_\_

- a. Paragraphs in Master Complaint upon which venue and jurisdiction lie:

Paragraphs 9-28

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- b. Other allegations of jurisdiction and venue:
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10. Defendants' Inferior Vena Cava Filter(s) about which Plaintiff(s) is making a claim

(Check applicable Inferior Vena Cava Filters):

☐ Günther Tulip® Vena Cava Filter

☐ Cook Celect® Vena Cava Filter

☐ Gunther Tulip Mreye

☒ Cook Celect Platinum

☐ Other:

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11. Date of Implantation as to each product:

February 9, 2016

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12. Hospital(s) where Plaintiff was implanted (including City and State):

St. Joseph Medical Center, Bloomington, IL

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13. Implanting Physician(s):

Dr. Jesse VanLe

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14. Counts in the Master Complaint brought by Plaintiff(s):

☒ Count I: Strict Products Liability – Failure to Warn

☒ Count II: Strict Products Liability – Design Defect

☒ Count III: Negligence

☒ Count IV: Negligence Per Se

☒ Count V: Breach of Express Warranty

☒ Count VI: Breach of Implied Warranty

☒ Count VII: Violations of Applicable Illinois Law Prohibiting Consumer

Fraud and Unfair and Deceptive Trade Practices

☐ Count VIII: Loss of Consortium

☐ Count IX: Wrongful Death

☐ Count X: Survival

☒ Count XI: Punitive Damages

☐ Other: \_\_\_\_\_ (please state the facts supporting  
this Count in the space, immediately below)

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15. Attorney for Plaintiff(s):

Zainab Tarique and Leslie MacLean

16. Address and bar information for Attorney for Plaintiff(s):

3141 Hood Street, Suite 700, Dallas, TX 75219

Zainab's Bar# 24113095

Leslie's Bar # 00794209

/s/Zainab Tarique

Zainab Tarique

TX Bar No. 24113095

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***Lead Counsel for Plaintiffs***

**CERTIFICATE OF SERVICE**

I hereby certify that on January 10, 2020, a copy of the foregoing was served electronically and notice of the service of this document will be sent to all parties by operation of the Court's electronic filing system to CM/ECF participants registered to receive service in this matter. Parties may access this filing through the Court's system.

/s/Zainab Tarique